AIR LINE PILOTS ASSOCIATION, INTERNATIONAL
7950 Jones Branch Drive, Suite 400S | McLean, VA 22102 | 703-689-2270 | 888-FLY-ALPA
THE WORLD'S LARGEST PILOTS UNION | WWW.ALPA.ORG

January 22, 2021

Ms. Stacey Zee
Office of Commercial Space Transportation
Federal Aviation Administration
800 Independence Ave SW
Washington D.C. 20591

Sent per email: spacexbocachica@icf.com

RE: Public Scoping Period for Boca Chica Launch Site

Dear Ms. Zee,

The Air Line Pilots Association, International (ALPA), representing more than 59,000 pilots at 35 United States (U.S.) and Canadian airlines, appreciates the opportunity to provide comments during the public scoping period to assist the Federal Aviation Administration (FAA) in determining the scope of issues in preparation of a Programmatic Environmental Assessment (EA) for SpaceX Starship/Super Heavy commercial space operations at the Boca Chica Launch Site, Texas. ALPA supports a National Airspace System (NAS) that is safe and efficient for all stakeholders. However, gaps in previous commercial space EAs require careful review and revision to the EA process. ALPA has identified several issues that need to be addressed by the FAA during the Scoping and EA process.

Since 2018, EAs no longer evaluate NAS impacts. Airspace impacts during previous EAs have been unduly vague, have ignored fundamental airspace safety and operational issues essential to a safe and efficient NAS. The FAA should consider revising current airspace evaluation requirements for EAs to include:

- Environmental and safety impacts to traditional NAS stakeholders above 10,000 feet.
- Additional information needed to more thoroughly review and comment on the intended operation including the flight profiles, the speeds at the altitudes where a commercial space vehicle will encounter commercial aviation traffic.
- The amount of time involved in the operation from take-off, reentry, and landing.
- The performance envelope of the space vehicle when operating in airspace shared with commercial aircraft.

- Airspace impacts on surrounding/adjacent airports, based on vehicle trajectories.
- Operational impacts for airspace closures such as longer flight routes, additional fuel burn/carbon emissions, longer flight duration, and delays to access airports.

Instead of merely conducting an EA and carrying out the minimal amount of necessary review and process as established by law and policy, the FAA should be conducting a comprehensive impact assessment for the reasons stated above.

As with any new entrant or technology introduced into the NAS, the safety of existing aircraft operations must be maintained at their previous high levels of safety, and the operational impacts must be known and documented. ALPA supports the safe operation of commercial space activities in the NAS when and where possible and welcomes the opportunity to work with the FAA and stakeholders to ensure that the operations are compatible with existing aircraft operations without major disruptions or decreased levels of safety.

ALPA appreciates the opportunity to provide comments during the EA scoping process. If you would like to discuss ALPA concerns, please do not hesitate to contact Engineering and Air Safety at eas@alpa.org or (800 424-2470).

Sincerely,

Captain Doug Willey, Chair
Air Traffic Services Group (ATS)
Air Line Pilots Association, Int'l